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UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF
MONTANA

In Re

JOHN HENRY SCHNEIDER,
Debtor.

Case No. 14-61357

NOTICE OF HEARING

Hearing Date: March 10, 2015
Hearing Time: 9:00 a.m.
Location: Bighorn Courtroom,
United States Courthouse, 2601
2nd Ave North, Billings, Montana.

RESPONSE TO TRUSTEE'S TURNOVER MOTION

Debtor responds as follows to the Trustee's Motion for Turnover
dated January 15, 2015 [Doc. # 30].

1. The motion is substance identical to documents requested in a letter from the trustee dated January 14, 2015. Debtor has supplied the Trustee with virtually all of the information that letter. This amounts to approximately sixteen bankers boxes of paper documentation and several

thousand pages of documents in electric form. The Trustee, in fact, continued the § 341 meeting to allow him to examine the documents already provided.

2. The Trustee requested additional documents at the § 341 meeting which Debtor is in the process of producing.

3. Debtor is being fully cooperative with the Trustee and is willing to produce any documents in his possession and control to the trustee. However, he does not want to run the risk of being held in contempt of court for inadvertently not producing one or two documents in a truly massive production request.

4. Debtor requests that, at the hearing notice above, that the Trustee be required to identify with specificity which documents he has requested that have not been produced and any turnover order be limited to such documents.

DATED: February 2, 2015.

DYE & MOE, P.L.L.P.

/s/ Harold V. Dye
Harold V. Dye

CERTIFICATE OF SERVICE

I, the undersigned certify under penalty of perjury that on February 2, 2015, copies of the foregoing Response to Trustee's Turnover Motion were served electronically by ECF notice to all persons/ entities requesting special notice or otherwise entitled to same and that in addition service by mailing a true and correct copy, first class mail, postage prepaid, was made to the following persons/ entities who are not ECF registered users

/s/ Harold V. Dye

Harold V. Dye